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March 22, 2021

VIA ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted.
SO ORDERED

March 23, 2021
New York, NY

/s/ John G. Koeltl
John G. Koeltl
U.S.D.J.

Re: *Vladimir Vyrkin v. Triborough Bridge and Tunnel Auth., et al., 18 Civ. 12106 (JGK)*

Dear Judge Koeltl,

We represent the Defendants in this matter and write jointly with *Pro Se* Plaintiff to respectfully request a two-week extension of the deadline for the parties to submit a proposed joint pre-trial order (“JPTO”) from March 24, 2021 until April 7, 2021. This is the first such extension and it will not impact any other deadlines in this matter.

The reason for the extension is that the parties were unable to confer about the JPTO until today, and Plaintiff was previously unaware that the Court issued an opinion and order regarding Defendants’ motion for summary judgment. The parties have agreed to the following interim deadlines:

- Plaintiff to exchange his portion of the JPTO: March 31, 2021
- Defendant Cabrera to exchange his portion of the JPTO: April 5, 2021
- Defendant to file the JPTO on behalf of all parties: April 7, 2021.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Steven Silverberg

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**HOGUET NEWMAN
REGAL & KENNEY, LLP**

cc: **VIA ECF AND E-MAIL**

Vladimir Vyrkin

Plaintiff *Pro Se*